

State of Colorado
Energy & Carbon Management Commission

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Document Number:

404106956

Date Received:

02/26/2025

Spill report taken by:

Brown, Kari

Spill/Release Point ID:

489384

SPILL/RELEASE REPORT (SUPPLEMENTAL)

This form is to be submitted by the party responsible for the oil and gas spill or release. Refer to ECMC Rule 912.b. for reporting requirements of spills or releases of E&P Waste, produced Fluids, or unauthorized Releases of natural gas. Submit a Site Investigation and Remediation Workplan (Form 27) if Rule 913.c. applies.

OPERATOR INFORMATION

Name of Operator: <u>KP KAUFFMAN COMPANY INC</u>	Operator No: <u>46290</u>	Phone Numbers
Address: <u>1700 LINCOLN ST STE 4550</u>		Phone: <u>(720) 8689848</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80203</u>		Mobile: <u>(205) 9144843</u>
Contact Person: <u>Cullen Chew</u>		Email: <u>cchew@kpk.com</u>

Transfer of Operatorship: Pursuant to Rule 912.f, this Supplemental Form 19 is being submitted to designate the Buying Operator as the responsible Operator for this Spill and Release.

INITIAL SPILL/RELEASE REPORT

Initial Spill/Release Report Doc# 404094753

Initial Report Date: 02/14/2025 Date of Discovery: 02/14/2025 Spill Type: Recent Spill

Spill/Release Point Location:

QTRQTR NWSW SEC 21 TWP 2N RNG 66W MERIDIAN 6

Latitude: 40.121444 Longitude: -104.789694

Municipality (if within municipal boundaries): _____ County: WELD

Enter Lat./long measurement of the actual Spill/Release Point. Lat./Long. Data shall meet standards of Rule 216.

Check this box if this spill/release is related to a loss of integrity of a flowline, pipeline, crude oil transfer line, or produced water transfer line.

Reference Location:

Facility Type: OFF-LOCATION FLOWLINE Facility/Location ID No 478843

Spill/Release Point Name: Facility 9 @ Hladky O'Gorman Well API No. (Only if the reference facility is well) 05- -

No Existing Facility or Location ID No.

Estimated Total Spill Volume: use same ranges as others for values

Estimated Oil Spill Volume(bbl): Unknown Estimated Condensate Spill Volume(bbl): 0

Estimated Flow Back Fluid Spill Volume(bbl): 0 Estimated Produced Water Spill Volume(bbl): Unknown

Estimated Other E&P Waste Spill Volume(bbl): 0 Estimated Drilling Fluid Spill Volume(bbl): 0

Specify: _____

Has the subject Spill/Release been controlled at the time of reporting? Yes

Land Use:

Current Land Use: CROP LAND

Other(Specify): _____

Weather Condition: cloudy, 40 degrees

Surface Owner: FEE

Other(Specify): Hladky Land and Cattle

Describe what is known about the spill/release event (what happened -- including how it was stopped, contained, and recovered):

At approximately 1:30pm on 2/14/2025 KPK was notified by a KWS roustabout crew that a line was struck during excavation, causing a spill. Crews were completing the abandonment of the Hladky O'Gorman 4 flowline when the underlying 4" steel Facility 9 Consolidation line was struck and a spill occurred. The line was immediately isolated, blown down, and KPK placed a jiffy clamp on the line. The spill flowed into a trench dug by KPK during P&A operations and has not flowed onto the surface. The volume of the spill is currently unknown. Crews have removed the liquids from the trench via vac truck and are scraping and removing contaminated soil. KPK has notified the landowner via email and has completed the Weld County OEM report form. The spill is approximately 500' west of a wetland. Approximately 63 yds³ of impacted soil have been disposed of at Buffalo Ridge landfill (see attached manifests). Additional soil is stockpiled in a lined, bermed area of the site.

List of Agencies and Other Parties Notified Pursuant to Rule 912.b.(7)-(11):

OTHER NOTIFICATIONS

Date	Agency/Party	Contact	Phone	Response
2/15/2025	Weld County OEM		-	on-line webform
2/15/2025	ECMC	Kari Brown	-	via email
2/15/2025	ECMC	Nikki Graeber	-	via email
2/14/2025	Hladky Land and Cattle		-	via email

REPORT CRITERIA

Rule 912.b.(1) Report to the Director (select all criteria that apply):

Yes Rule 912.b.(1).A: A Spill or Release of any size that impacts or threatens to impact any Waters of the State, Public Water System, residence or occupied structure, livestock, wildlife, or publicly-maintained road.

Waters of the State: Impacted Public Water System: n/a
Residence or Occupied Structure: n/a Livestock: n/a
Wildlife: n/a Publicly-Maintained Road: n/a

Yes Rule 912.b.(1).B: A Spill or Release in which 1 barrel or more of E&P Waste or produced fluids is spilled or released outside of berms or other secondary containment.

Yes Rule 912.b.(1).C: A Spill or Release of 5 barrels or more of E&P Waste or produced Fluids regardless of whether the Spill or Release is completely contained within berms or other secondary containment.

No Rule 912.b.(1).D: Within 6 hours of discovery, a Grade 1 Gas Leak. For a Grade 1 Gas Leak from a Flowline, the Operator also must submit the Form 19 – Initial, document number on a Form 44, Flowline Report, for the Grade 1 Gas Leak

Enter the approximate time of discovery _____ (HH:MM)
Enter the Document Number of the Grade 1 Gas Leak Report, Form 44 _____
Was there a reportable accident associated with either a Grade 1 Gas Leak or an E&P waste spill or release? _____
Enter the Document Number of the Initial Accident Report, Form 22 _____
Was there damage during excavation? _____
Was CO 811 notified prior to excavation? _____

Yes Rule 912.b.(1).E: The discovery of 10 cubic yards or more of impacted material resulting from a current or historic Spill or Release. Discovery and reporting will not be contingent upon confirmation samples demonstrating exceedance of Table 915-1 standards.

Estimated Volume of Impacted Solids (cu. yd.): 63

Yes Rule 912.b.(1).F: The discovery of impacted Waters of the State, including Groundwater. Discovery and reporting will not be contingent upon confirmation samples demonstrating exceedance of Table 915-1 standards. The presence of free product or hydrocarbon sheen on Groundwater or surface water is reportable. The presence of contaminated soil in contact with Groundwater or surface water is reportable. Check all that apply:

The presence of free product or hydrocarbon sheen Surface Water

The presence of free product or hydrocarbon sheen on Groundwater

The presence of contaminated soil in contact with Groundwater

The presence of contaminated soil in contact with Surface water

Yes Rule 912.b.(1).G: A suspected or actual Spill or Release of any volume where the volume cannot be immediately determined, including a spill or release of any volume that daylight from the subsurface.

No Rule 912.b.(1).H: Spill or Release resulting in vaporized hydrocarbon mists that leave the Oil and Gas Location or Off-Location Flowline right of way from an Oil and Gas Location and impacts or threatens to impact off-location property.

Areas offsite of Oil & Gas Location Off-Location Flowline right of way

No Rule 912.b.(1).I: A Release of natural gas that results in an accumulation of soil gas or gas seeps.

No Rule 912.b.(1).J: A Release that results in natural gas in Groundwater.

SPILL/RELEASE DETAIL REPORTS

#1 Supplemental Report Date: 02/26/2025

FLUIDS	BBL's SPILLED	BBL's RECOVERED	Unknown
OIL	_____	_____	<input checked="" type="checkbox"/>
CONDENSATE	<u>0</u>	<u>0</u>	<input type="checkbox"/>
PRODUCED WATER	_____	_____	<input checked="" type="checkbox"/>
DRILLING FLUID	<u>0</u>	<u>0</u>	<input type="checkbox"/>
FLOW BACK FLUID	<u>0</u>	<u>0</u>	<input type="checkbox"/>
OTHER E&P WASTE	<u>0</u>	<u>0</u>	<input type="checkbox"/>

specify: _____

Was spill/release completely contained within berms or secondary containment? NO Was an Emergency Pit constructed? NO

Secondary containment, including walls & floor regardless of construction material, must be sufficiently impervious to contain any discharge from primary containment until cleanup occurs.

A Form 15 Pit Report shall be submitted within 30 calendar days after the construction of an emergency pit

Impacted Media (Check all that apply) Soil Groundwater Surface Water Dry Drainage Feature

Surface Area Impacted: _____ Length of Impact (feet): 32 Width of Impact (feet): 16

Depth of Impact (feet BGS): 8 Depth of Impact (inches BGS): _____

How was extent determined?

Through visual observation of soil staining

Soil/Geology Description:

Silty clay

Depth to Groundwater (feet BGS) 8 Number Water Wells within 1/2 mile radius: 27

If less than 1 mile, distance in feet to nearest

Water Well	<u>150</u>	None <input type="checkbox"/>	Surface Water	<u>140</u>	None <input type="checkbox"/>
Wetlands	<u>487</u>	None <input type="checkbox"/>	Springs	_____	None <input checked="" type="checkbox"/>
Livestock	<u>384</u>	None <input type="checkbox"/>	Occupied Building	<u>635</u>	None <input type="checkbox"/>

Additional Spill Details Not Provided Above:

Distances to potential receptors are as follows:
Water well: approximately 150' northeast of the spill
Surface water: unnamed freshwater pond located approximately 487' northeast of the spill
Wetlands: unnamed freshwater pond located approximately 487' northeast of the spill
Livestock: located approximately 384' north of the spill
Occupied building: located approximately 635' northeast of the release
No High Priority Habitats present in the vicinity.

CORRECTIVE ACTIONS

#1 Supplemental Report Date: 02/26/2025

Root Cause of Spill/Release Incorrect Operations (Human Error)

Other (specify)

Type of Equipment at Point of Spill/Release: Production Line

If "Other" selected above, specify or describe here:

Describe Incident & Root Cause (include specific equipment and point of failure)

Crews were completing the abandonment of the Hladky O'Gorman 4 flowline when the underlying 4" steel Facility 9 Consolidation line was struck at the 12 o'clock position and a spill occurred.

Describe measures taken to prevent the problem(s) from reoccurring:

KPK will hold additional training concerning line locates and proper excavation techniques.

Volume of Soil Excavated (cubic yards): 63

Disposition of Excavated Soil (attach documentation) Offsite Disposal Onsite Treatment

Other (specify)

Volume of Impacted Ground Water Removed (bbls):

Volume of Impacted Surface Water Removed (bbls):

REQUEST FOR CLOSURE

Spill/Release Reports should be closed when impacts have been remediated or when further investigation and corrective actions will take place under an approved Form 27.

Basis for Closure: Corrective Actions Completed (documentation attached, check all that apply)

Horizontal and Vertical extents of impacts have been delineated.

Documentation of compliance with Table 915-1 is attached.

All E&P Waste has been properly treated or disposed.

Work proceeding under an approved Form 27 (Rule 912.c).

Form 27 Remediation Project No: _____

SUSPECTED Spill/Release did not occur or was below Rule 912.a.(5) reporting thresholds.

OPERATOR COMMENTS:

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: _____ Print Name: Cullen Chew

Title: Environmental Coordinator Date: 02/26/2025 Email: cchew@kpk.com

COA Type**Description**

	<p>Per the COA on Form 19 Doc. # 404094753 and Per Rule 912.b.(4), the Operator shall make a supplemental report on Form 19 not more than 10 calendar days after the spill/release is discovered that includes:</p> <p>A. A topographic map showing the governmental section and location of the spill or an aerial photograph showing the location of the spill</p> <p>B. All pertinent information about the spill/release known to the Operator that has not been reported previously including photo documentation showing the source of the Spill or Release, the impacted area, and initial cleanup activity</p> <p>C. Information relating to the initial mitigation, site investigation, and remediation measures conducted by the Operator</p> <p>D. Global Positioning System data that meets the requirements of Rule 216 if latitude and longitude data provided pursuant to Rule 912.b.(2).A did not meet the requirements of Rule 216.</p> <p>Photo documentation was due by February 24, 2025 and has not been provided by the Operator to date (as of March 4, 2025). Operator has failed to comply with Rule 912.b.(4).</p> <p>Operator shall provide a Supplemental Form 19 with all requirements above as soon as possible but within 3 business days (March 8, 2025).</p>
	<p>The Supplemental Report for this spill/release was not submitted within 10 days of discovery of the spill/release as required by Rule 912.b.(4). Operator will provide explanation for late report on the next Form 19 Supplemental including actions implemented to prevent late reporting in the future.</p>
	<p>Pursuant to Rule 912.b.(6) Operator is required to submit a Form 19 Supplemental Report for the associated spill within 90 days of the spill date requesting closure pursuant to Rule 913.h and supported by adequate documentation to demonstrate that the Spill or Release has been fully cleaned up and complies with Table 915-1; or A Form 27 if any of the criteria listed in Rules 912.b.(6).B.i–iii apply. If Remediation will continue under an approved Form 27, the Operator will also submit a Form 19 – Supplemental which requests closure of the Spill or Release and includes the Remediation project number assigned by the Director.</p> <p>Form 19 – Supplemental requesting closure is due by May 15, 2025.</p>
	<p>Due to the presence of impacted groundwater Operator shall:</p> <ul style="list-style-type: none"> -Comply with Table 915-1 Protection of Groundwater Soil Screening Level Concentrations. -Operator will install monitoring wells (within the spill/release area, cross-gradient, down-gradient, and up-gradient) to properly characterize groundwater pursuant to Rule 915 and determine hydraulic gradient, as required by Rule 915.e.(3)A.ii. All monitoring wells shall be constructed as permanent monitoring wells in accordance with the State Engineer's Water Well Construction and Permitting Rules -Operator will analyze groundwater samples from all monitoring wells for Table 915-1 organic and inorganic parameters for a minimum of four quarterly monitoring events. -Submit a Form 27 Site Investigation and Remediation Workplan with a proposed workplan and timeline for remediation of this Release.
	<p>ECMC has corrected the subject form.</p> <ul style="list-style-type: none"> -ECMC updated the sensitive receptor distances to include the following: The nearest surface water (pond/ditch) is approximately 140 ft south of the location. <p>Per Rule 912.b.(10) at the same time the Operator submits a Form 19 – Initial Operators are required to provide written and/or verbal notification to CPW if the Spill or Release occurred within 300 feet of surface Waters of the State or within High Priority Habitat(s). Operator has not included Waters of the State (Flume Ditch, Riverine, surface water/pond) in their correspondence with CPW. Operator shall notify CPW immediately and provide the correspondence on the subsequent Supplemental Form 19.</p>

	<p>Operator's Corrective Action Report is insufficient. Operator does not specify the CAUSE of the line strike nor measure to prevent recurrence from other flowlines. Operator shall submit a detailed corrective action report providing a root cause and what is being done at this and other locations to prevent a reoccurrence. Operator shall also coordinate with ECMC Integrity Inspector regarding pipeline excavation, assessment, repair, and testing prior to re-energizing.</p> <p>Note: Pursuant to Rule 912.d.(2), The Director may take enforcement action if a Spill occurs at any site subject to control of the same Operator as a result of similar causes identified in Rule 912.d.(1).</p>
6 COAs	

ATTACHMENT LIST

<u>Att Doc Num</u>	<u>Name</u>
404106956	FORM 19 SUBMITTED
404107700	DISPOSAL MANIFEST
404107961	MAP

Total Attach: 3 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)